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HONORABLE WHITMAN L. HOLT

Co-Counsel to Debtors and Debtors in Possession

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*Admitted *Pro Hac Vice*

Proposed Co-Counsel to Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

ICAP ENTERPRISES, INC., *et al.*,

Debtors.¹

Chapter 11

Lead Case No. 23-01243-WLH11
Jointly Administered

**FIRST MONTHLY FEE
APPLICATION OF O'MELVENY &
MYERS LLP FOR ALLOWANCE
AND PAYMENT OF INTERIM
COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF JANUARY**

¹ The Debtors (along with their case numbers) are iCap Enterprises, Inc. (23-01243-11); iCap Pacific NW Management, LLC (23-01261-11); iCap Vault Management, LLC (23-01258-11); iCap Vault, LLC (23-01256-11); iCap Vault 1, LLC (23-01257-11); Vault Holding 1, LLC (23-01265-11); iCap Investments, LLC (23-01255-11); iCap Pacific Northwest Opportunity and Income Fund, LLC (23-01248-11); iCap Equity, LLC (23-01247-11); iCap Pacific Income 4 Fund, LLC (23-01251-11); iCap Pacific Income 5 Fund, LLC (23-01249-11); iCap Northwest Opportunity Fund, LLC (23-01253-11); 725 Broadway, LLC (23-01245-11); Senza Kenmore, LLC (23-01254-11); iCap Campbell Way, LLC (23-01250-11); UW 17th Ave, LLC (23-01267-11); iCap Broadway, LLC (23-01252-11); VH 1121 14th LLC (23-01264-11); VH Senior Care LLC (23-01266-11); VH Willows Townhomes LLC (23-01262-11); iCap @ UW, LLC (23-01244-11); VH 2nd Street Office, LLC (23-01259-11); VH Pioneer Village LLC (23-01263-11); iCap Funding LLC (23-01246-11); iCap Management LLC (23-01268-11); iCap Realty, LLC (23-01260-11); Vault Holding, LLC (23-01270-11); iCap Pacific Development LLC (23-01271-11); iCap Holding LLC (23-01272-11); iCap Holding 5 LLC (23-01273-11); iCap Holding 6 LLC (23-01274-11); Colpitts Sunset, LLC (23-01432-11); CS2 Real Estate Development LLC (23-01434-11); and iCap International Investments, LLC (23-01464-11).

**O'MELVENY & MYERS LLP FIRST
MONTHLY FEE APPLICATION FOR THE
PERIOD OF JANUARY 16, 2024 THROUGH
FEBRUARY 29, 2024 – PAGE 1**

BLACK HELTERLINE LLP
805 SW BROADWAY
SUITE 1900
PORTLAND, OR 97205
TELEPHONE: 503 224-5560

**16, 2024 THROUGH FEBRUARY 29,
2024**

[No Hearing Required Pursuant to
L.B.R. 2002-1(c)(1)]

O’Melveny & Myers LLP (“OMM”) submits this *First Monthly Fee Application of O’Melveny & Myers, LLP for Allowance and Payment of Interim Compensation and Reimbursement of Expenses for the Period of January 16, 2024 through February 29, 2024* (the “Application” and the “Application Period,” respectively) for work performed for the above-captioned debtors and debtors in possession (the “Debtors”).

In support of the Application, OMM respectfully represents as follows:

1. On February 22, 2024, the Debtors were authorized to employ OMM as co-counsel to the Debtors, effective as of January 16, 2024 [ECF No. 461]. OMM hereby applies to the court for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the Application Period.

2. OMM billed a total of \$472,253.37 in fees and expenses during the Application Period. The total fees represent 371.3 hours expended during the Application Period. These fees and expenses break down as follows:

Period	Fees	Expenses	Total
January 16, 2024 – February 29, 2024	\$471,913.00	\$340.37	\$472,253.37

3. Accordingly, OMM seeks allowance of interim compensation in the total amount of \$472,253.37 at this time. This total is comprised of \$471,913.00 (the fees for services rendered) plus \$340.37 (the expenses incurred). OMM will only apply 80% of the fees paid to outstanding invoices and will hold the additional 20% of the fees in trust pending approval of such fees through a quarterly interim fee application.

**O'MELVENY & MYERS LLP FIRST
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PERIOD OF JANUARY 16, 2024 THROUGH
FEBRUARY 29, 2024 – PAGE 2**

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1 4. Attached as Exhibit A to this Application is the name of each professional
2 who performed services in connection with these cases during the Application Period
3 and the hourly rate for each such professional. Attached as Exhibit B to this Application
4 are the detailed time and expense statements for the Application Period.

5 5. OMM has served a copy of this Application on the applicable notice parties
6 (the “Notice Parties”) set forth in the *Order Granting Debtors’ Motion for Order*
7 *Establishing Interim Fee Application and Expense Reimbursement Procedures* that was
8 entered on November 17, 2023 [ECF No. 168] (“Compensation Procedures Order”).
9 The Application was mailed by first class mail, postage prepaid, on or about May 7,
10 2024. Notice of the filing of this Application was served on the foregoing parties as well
11 as any party who has requested special notice in these chapter 11 cases as of the date of
12 the notice. The notice was mailed by first class mail, postage prepaid, on or about May
13 7, 2024.

14 6. Pursuant to the Compensation Procedures Order, the Debtors are
15 authorized, but not directed, to make the payment requested herein without a further
16 hearing or order of this court unless an objection to this Application is filed with the
17 court and served upon the Notice Parties within 14 calendar days after the date of
18 mailing of the notice of this Application. If such an objection is filed, the Debtors are
19 authorized, but not directed, to pay 100% of the uncontested fees and expenses without
20 further order of the court. If no objection is filed, the Debtors are authorized, but not
21 directed, to pay 100% of all fees and expenses requested in the Application without
22 further order of the court; provided, however, that in either case, OMM will hold 20%
23 of the amount of the fees paid in trust pending approval of such fees through a quarterly
24 interim fee application.

25 7. The interim compensation and reimbursement of expenses sought in this
26 Application are not final. Upon the conclusion of these cases, OMM will seek fees and

**O’MELVENY & MYERS LLP FIRST
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1 reimbursement of the expenses incurred for the totality of the services rendered in these
2 cases. Any interim fees or reimbursement of expenses approved by this court and
3 received by OMM will be credited against such final fees and expenses as may be
4 allowed by this court.

5 8. OMM respectfully requests that the Debtors pay compensation to OMM
6 as requested herein pursuant to and in accordance with the terms of the Compensation
7 Procedures Order.

8
9 DATED this 7th day of May 2024.

10 O'MELVENY & MYERS LLP

11
12 By /s/ Julian I. Gurule
13 JULIAN I. GURULE (Admitted *Pro Hac Vice*)
14 O'MELVENY & MYERS LLP

15 *Co-Counsel to Debtors and Debtors in Possession*

16 Submitted by:

17 BLACK HELTERLINE LLP

18
19 By /s/ Oren B. Haker
20 OREN B. HAKER, WSBA No. 48725
21 BLACK HELTERLINE LLP

22 *Proposed Co-Counsel to Debtors and
23 Debtors in Possession*

24
25
26 **O'MELVENY & MYERS LLP FIRST
MONTHLY FEE APPLICATION FOR THE
PERIOD OF JANUARY 16, 2024 THROUGH
FEBRUARY 29, 2024 – PAGE 4**

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Exhibit A

Timekeeper	Rate	Total Hours	Total Fees
Julian Gurule	\$1,245.00*	116.5	\$145,042.50
Madhu Pocha	\$1,425.00	29.3	\$41,752.50
Jorge deNeve	\$1,450.00	4.1	\$5,945.00
Patrick J. Jones	\$1,250.00	39.6	\$49,500.00
Diana M. Perez	\$1,385.00	67.6	\$93,626.00
Samantha M. Indelicato	\$1,250.00	93.9	\$117,375.00
Aly Bailey	\$980.00	17.7	\$17,346.00
Sharlean Perez	\$510.00	2.6	\$1,326.00
Total		371.3	\$471,913.00

**Discounted Hourly Rate*

**O'MELVENY & MYERS LLP FIRST
MONTHLY FEE APPLICATION FOR THE
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Exhibit B

**O'MELVENY & MYERS LLP FIRST
MONTHLY FEE APPLICATION FOR THE
PERIOD OF JANUARY 16, 2024 THROUGH
FEBRUARY 29, 2024 – PAGE 6**

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omm.com

Taxpayer ID: 95-1066597

LANCE MILLER
ICAP ENTERPRISES, INC.

March 28, 2024
OMM Matter: 0409314-00001
Invoice: 1170683
Contact: JULIAN GURULE

DEBTOR MATTERS

For Professional Services Rendered Through January 31, 2024

Total Fees	\$93,300.00
Total Current Invoice	\$93,300.00

Due upon receipt. Please remit to:
By Mail: O'Melveny & Myers LLP - P.O. Box 894436, Los Angeles, CA 90189-4436
By Wire Transfer: Citibank, N.A., NY, ABA # 021000089, SWIFT: CITIUS33
Beneficiary: O'Melveny & Myers LLP, Account No.: #4078-0224
Please include 0409314-00001 / 1170683 number in Advice

Austin • Century City • Dallas • Houston • Los Angeles • Newport Beach • New York • San Francisco • Silicon Valley • Washington, DC
Beijing • Brussels • Hong Kong • London • Seoul • Shanghai • Singapore • Tokyo

Client: ICAP ENTERPRISES, INC.
Matter Name: DEBTOR MATTERS
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DEBTOR MATTERS

For Professional Services Rendered Through January 31, 2024

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
B110 CASE ADMINISTRATION			
01/16/24	J GURULE	REVIEW COMMON INTEREST ISSUES	0.3
01/17/24	J GURULE	TELEPHONE CONFERENCE WITH K. TARAZI REGARDING STATUS	0.4
01/17/24	J GURULE	TELEPHONE CONFERENCE WITH L. MILLER REGARDING STATUS	0.3
01/17/24	J GURULE	TELEPHONE CONFERENCE WITH L. MILLER REGARDING DEBRIEF	0.3
01/18/24	J GURULE	TELEPHONE CONFERENCE WITH K. TARAZI REGARDING OPEN ISSUES	0.1
01/18/24	J GURULE	TELEPHONE CONFERENCE WITH K. TARAZI REGARDING STATUS	0.3
01/19/24	J GURULE	REVIEW NOA	0.2
01/21/24	J GURULE	TELEPHONE CONFERENCE WITH L. MILLER REGARDING STATUS AND OPEN ITEMS	0.6
01/22/24	S PEREZ	PREPARE FILING FOR NOTICE OF APPEARANCE AND CHANGE OF FIRM FOR J. GURULE INCLUDING COORDINATE AND CONFIRMATION OF FILING WITH COURT SERVICES.	0.8
01/22/24	J GURULE	EMAILS REGARDING UMPQUA CLAIMS	0.2
01/24/24	J GURULE	TELEPHONE CONFERENCE WITH L MILLER REGARDING OPEN ITEMS	0.3
01/24/24	J GURULE	TELEPHONE CONFERENCE WITH L MILLER REGARDING STATUS	0.1
01/24/24	J GURULE	TELEPHONE CONFERENCE WITH L MILLER REGARDING STRATEGY	0.2
01/25/24	J GURULE	TELEPHONE CONFERENCE L MILLER REGARDING STATUS	0.4
01/25/24	S INDELICATO	REVIEW/ANALYZE FILINGS IN ICAP FOR BACKGROUND	1.8
01/25/24	D PEREZ	FOLLOW UP J. GURULE REGARDING ICAP ENTERPRISES BACKGROUND AND NEXT STEPS (.6); REVIEW MOU REGARDING SAME (.2); REVIEW CONFLICTS REGARDING SAME (.4)	1.2
01/26/24	J GURULE	TELEPHONE CONFERENCE WITH K. TARAZI REGARDING STRATEGY	0.1
01/27/24	J GURULE	TELEPHONE CONFERENCE WITH L MILLER REGARDING STRATEGY	0.3
01/28/24	J GURULE	TELEPHONE CONFERENCE WITH K. TARAZI REGARDING OPEN ITEMS	0.2
01/29/24	J GURULE	TELEPHONE CONFERENCE L. MILLER REGARDING UCC ISSUES	0.2

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EXHIBIT B

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Client: ICAP ENTERPRISES, INC.
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
01/29/24	J GURULE	REVISIONS TO STATUS REPORT AND RELATED HEARING PREP	0.4
01/29/24	J GURULE	TELEPHONE CONFERENCE K.TARAZI REGARDING WORK STREAMS	0.3
01/30/24	J GURULE	TELEPHONE CONFERENCE K TARAZI REGARDING HEARING PREP	0.1
Total	B110 CASE ADMINISTRATION		9.1
B120 ASSET ANALYSIS & RECOVERY			
01/17/24	J GURULE	MEETING WITH COMMITTEE REGARDING DIP AND SETTLEMENT	1.0
01/25/24	J GURULE	DRAFT MOU AND REVISIONS AND CIRCULATE TO KORNFELD	1.0
01/25/24	J GURULE	TELEPHONE CONFERENCE D PEREZ REGARDING 9019 MOTION	0.6
01/25/24	S INDELICATO	REVIEW/ANALYZE COOPERATION AGREEMENT IN CONNECTION WITH 9019 MOTION	2.1
01/25/24	S INDELICATO	REVIEW/ANALYZE SETTLEMENT MOTIONS IN EASTERDAY RANCHES FOR USE IN ICAP	2.1
01/26/24	J GURULE	EMAIL WITH TEAM REGARDING 9019 MOTION	0.1
01/26/24	S INDELICATO	DRAFT AND REVISE MOTION TO APPROVE COOPERATION AGREEMENT	2.1
01/27/24	S INDELICATO	DRAFT AND REVISE MOTION TO APPROVE COOPERATION AGREEMENT	0.8
01/28/24	S INDELICATO	DRAFT AND REVISE MOTION TO APPROVE COOPERATION AGREEMENT	1.6
01/29/24	J GURULE	ANALYSIS OF UCC TERMS AND SETTLEMENT ISSUES	0.6
01/29/24	D PEREZ	REVIEW AND COMMENT ON 9019 MOTION (1.0); REVIEW AND COMMENT ON REVISED DRAFT OF SAME AND DECLARATION ISO MOTION (.5)	1.5
01/29/24	S INDELICATO	FURTHER REVISE MOTION TO APPROVE COOPERATION AGREEMENT	4.4
01/29/24	S INDELICATO	DRAFT DECLARATION IN SUPPORT OF MOTION TO APPROVE COOPERATION AGREEMENT	2.1
01/30/24	J GURULE	TELEPHONE CONFERENCE UCC REGARDING MOU AND STATUS	0.8
01/30/24	J GURULE	ATTENTION TO OPEN ISSUES WITH UCC	0.4
01/31/24	J GURULE	TELEPHONE CONFERENCE L MILLER REGARDING UCC SETTLEMENT	0.2
Total	B120 ASSET ANALYSIS & RECOVERY		21.4
B130 ASSET DISPOSITION			
01/16/24	J GURULE	REVIEW AIRLINK SALE ISSUES	0.2
01/17/24	J GURULE	ANALYSIS OF REAL PROPERTY SALES STATUS	0.6
01/19/24	J GURULE	REVIEW AND STRATEGY FOR BROKER ISSUES	1.3

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Client: ICAP ENTERPRISES, INC.
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
01/19/24	J GURULE	TELEPHONE CONFERENCE WITH K. TARAZI REGARDING AIRLINK	0.2
01/21/24	J GURULE	ATTENTION TO BROKER STRATEGY	0.5
01/22/24	J GURULE	REVIEW SALE PROCEDURES MOTION	0.2
01/24/24	J GURULE	ZOOM WITH COUNSEL FOR PROPERTY LENDERS	0.4
01/24/24	J GURULE	CORRESPONDENCE WITH LENDERS REGARDING SALE/MORTGAGE ISSUE	0.2
01/25/24	J GURULE	TELEPHONE CONFERENCE WITH K. TARAZI REGARDING SALE	0.2
01/25/24	J GURULE	TELEPHONE CONFERENCE WITH K. TARAZI REGARDING SALE	0.1
01/26/24	J GURULE	TELEPHONE CONFERENCE K.TARAZI REGARDING SALE ORDER	0.1
01/28/24	J GURULE	REVIEW STATUS OF LOAN AND SALE PROCEDURES	0.2
01/29/24	J GURULE	REVIEW CS2 PROPERTY ISSUES	0.3
01/29/24	J GURULE	CALL WITH UCC REGARDING CS2 SALE	0.4
01/30/24	J GURULE	PREP FOR ISSUES AND REVIEW SALES	0.3
Total	B130 ASSET DISPOSITION		5.2
B150 MEETINGS OF & COMMUNICATION W/ CREDITORS			
01/19/24	J GURULE	EMAILS WITH KORNFELD	0.1
01/24/24	J GURULE	TELEPHONE CONFERENCE WITH J KORNFELD REGARDING STATUS	0.5
01/24/24	J GURULE	PREP FOR 341(A) MEETING	0.3
01/24/24	J GURULE	TELEPHONE CONFERENCE WITH SEC ATTORNEY	0.4
01/24/24	J GURULE	CORRESPONDENCE WITH SEC REGARDING SERVICE	0.1
Total	B150 MEETINGS OF & COMMUNICATION W/ CREDITORS		1.4
B160 FEE/EMPLOYMENT APPLICATIONS			
01/23/24	J GURULE	EMAILS K TARAZI REGARDING RETENTION APPLICATION	0.2
01/25/24	J GURULE	EMAIL D PEREZ REGARDING EMPLOYMENT APP	0.1
01/26/24	D PEREZ	CALL WITH S. INDELICATO REGARDING ICAP 9019 MOTION (.2); ATTEND TO CONFLICTS ANALYSIS AND DRAFT RETENTION APPLICATION REGARDING SAME (5.2)	5.4
01/28/24	J GURULE	EMAILS WITH TEAM REGARDING ENGAGEMENT LETTER	0.1
01/29/24	J GURULE	REVIEW AND EMAILS WITH D PEREZ REGARDING OMM EMPLOYMENT APPLICATION	0.3
01/29/24	D PEREZ	REVISE ENGAGEMENT LETTER AND RETENTION APPLICATION (.4)	0.4
01/29/24	D PEREZ	ATTEND TO CONFLICTS (.2); PREPARE RETENTION APP (.7); DRAFT ENGAGEMENT LETTER (1.7)	2.6
01/30/24	D PEREZ	ATTEND TO CONFLICTS ANALYSIS	3.9

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
01/31/24	D PEREZ	ATTEND TO CONFLICTS ANALYSIS (3.6)	3.6
Total	B160 FEE/EMPLOYMENT APPLICATIONS		16.6
B180 AVOIDANCE ACTION ANALYSIS			
01/18/24	J GURULE	ATTENTION TO LITIGATION STRATEGY ISSUES	0.7
01/18/24	J GURULE	TELEPHONE CONFERENCE D. MARK REGARDING EXPORT REPORT	1.0
01/19/24	J GURULE	GROUP CALL WITH EXPERT	0.5
01/19/24	J GURULE	ANALYSIS OF EXPERT REPORT ISSUES	0.7
01/19/24	J GURULE	TELEPHONE CONFERENCE WITH L. MILLER REGARDING EXPERT ISSUES	0.2
01/24/24	J GURULE	TELEPHONE CONFERENCE WITH LITIGATION TEAM AND EXPERT	1.1
01/25/24	J GURULE	CALL WITH LITIGATION TEAM	0.7
01/26/24	J GURULE	TELEPHONE CONFERENCE WITH L MILLER REGARDING LITIGATION STRATEGY - ICAP	0.3
01/26/24	J GURULE	ANALYSIS OF LIT STRATEGY ISSUES	0.6
01/29/24	J GURULE	TELEPHONE CONFERENCE K.TARAZI REGARDING LITIGATION	0.1
01/29/24	J GURULE	DISCUSSION WITH LITIGATORS REGARDING STRATEGY	1.4
01/30/24	J GURULE	ATTEND LITIGATION STRATEGY CALL	1.0
01/30/24	J GURULE	CORRESPONDENCE AND REVIEW LITIGATION ITEMS	0.7
Total	B180 AVOIDANCE ACTION ANALYSIS		9.0
B190 OTHER CONTESTED MATTERS			
01/22/24	J GURULE	PARTICIPATION IN LITIGATION TEAM MEETING	1.2
01/29/24	J GURULE	CORRESPONDENCE REGARDING PREPETITION SUNSET TERRANCE LITIGATION	0.2
01/30/24	J GURULE	TELEPHONE CONFERENCE WITH J. LESNICK REGARDING SUBPOENA	0.4
01/30/24	J GURULE	TELEPHONE CONFERENCE MARK AND LESNICK REGARDING SUBPOENA	0.2
01/30/24	J GURULE	TELEPHONE CONFERENCE WITH J. LESNICK REGARDING SUBPOENA	0.2
01/31/24	J GURULE	EMAILS WITH LESNICK REGARDING SUBPOENA	0.1
01/31/24	J GURULE	TELEPHONE CONFERENCE WITH LITIGATION TEAM REGARDING SUBPOENA ISSUES	0.7
01/31/24	J GURULE	ANALYSIS OF LITIGATION STRATEGY AND SUBPOENAS	0.3
Total	B190 OTHER CONTESTED MATTERS		3.3
B230 FINANCING/CASH COLLATERAL			
01/18/24	J GURULE	REVIEW DIP ISSUES	0.5
01/18/24	J GURULE	REVIEW DIP FINANCING ISSUES	0.3

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Client: ICAP ENTERPRISES, INC.
Matter Name: DEBTOR MATTERS
Matter: 0409314-00001

03/28/24
Invoice: 1170683
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
01/20/24	J GURULE	REVISIONS TO DIP TERM SHEET	0.7
01/22/24	J GURULE	REVIEW DIP TERM SHEET	0.4
01/25/24	J GURULE	ATTENTION TO DIP ISSUES AND CORRESPONDENCE	0.4
01/25/24	J GURULE	ANALYSIS AND EMAILS WITH CO-COUNSEL REGARDING DIP LOAN AGREEMENT AND DIP ORDER	0.3
01/29/24	J GURULE	REVIEW DIP TERMS, CORRESPONDENCE, AND OPTIONS	0.4
01/31/24	J GURULE	TELEPHONE CONFERENCE D PEREZ REGARDING DIP ORDER AND DIP MOTION, BROKER ISSUES	0.4
01/31/24	J GURULE	TELEPHONE CONFERENCE WITH K.TARAZI REGARDING DIP	0.1
01/31/24	J GURULE	TELEPHONE CONFERENCE WITH K.TARAZI REGARDING DIP LOAN AGREEMENT	0.1
01/31/24	S INDELICATO	REVIEW DIP LOAN AND SECURITY AGREEMENT	1.2
01/31/24	S INDELICATO	REVIEW/ANALYZE DIP ORDER AND DIP AGREEMENT IN CONNECTION WITH SUPPLEMENTAL DIP	1.2
01/31/24	S INDELICATO	DRAFT AND REVISE SUPPLEMENTAL DIP ORDER	2.1
01/31/24	S INDELICATO	RESEARCH REGARDING SUPPLEMENTAL DIP ORDER TERMS	0.9
01/31/24	S INDELICATO	CALL WITH D. PEREZ REGARDING SUPPLEMENTAL DIP MOTION AND DIP AGREEMENT	0.2
01/31/24	D PEREZ	CALL WITH J. GURULE REGARDING DIP ORDER (.4); FOLLOW UP WITH S. INDELICATO REGARDING SAME (.2)	0.6
Total	B230 FINANCING/CASH COLLATERAL		9.8
B260 BOARD OF DIRECTORS MATTERS			
01/22/24	J GURULE	BOARD MEETING TO DISCUSS AGENDA ITEMS	1.0
01/22/24	J GURULE	PREP FOR BOARD MEETING	0.4
Total	B260 BOARD OF DIRECTORS MATTERS		1.4
B330 COURT HEARINGS			
01/30/24	J GURULE	ATTENDANCE AT TELEPHONIC HEARING	0.4
Total	B330 COURT HEARINGS		0.4
Total Hours			77.6
Total Fees			\$93,300.00
Total Current Invoice			\$93,300.00

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Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>
Attorneys	
JULIAN GURULE	35.0
DIANA M. PEREZ	19.2
SAMANTHA M. INDELICATO	22.6
Total for Attorneys	76.8
Paralegal/Litigation Support	
SHARLEAN PEREZ	0.8
Total for Paralegal/Litigation Support	0.8
Total	77.6

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Remittance Page

LANCE MILLER
ICAP ENTERPRISES, INC.

March 28, 2024
OMM Matter: 0409314-00001
Invoice: 1170683
Contact: JULIAN GURULE

DEBTOR MATTERS

For Professional Services Rendered Through January 31, 2024

Total Fees	\$93,300.00
Total Current Invoice	\$93,300.00

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

For questions, please contact Rachel Chan
rchan@omm.com
(213) 430-6459

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DEBTOR MATTERS

For Professional Services Rendered Through February 29, 2024

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
B110 CASE ADMINISTRATION			
02/01/24	J GURULE	ICAP - CALL WITH K. TARAZI REGARDING OPEN ISSUES	0.1
02/01/24	J GURULE	ICAP - CALL WITH L. MILLER REGARDING STATUS	0.4
02/05/24	J GURULE	ICAP - CALL WITH D. MARK REGARDING STATUS	0.5
02/05/24	J GURULE	ICAP - CALL WITH L MILLER REGARDING UCC MEETING	0.3
02/06/24	J GURULE	ICAP TELEPHONE CALL WITH K TARAZI REGARDING OPEN ITEMS	0.4
02/07/24	J GURULE	ICAP - CALL WITH G. DYER REGARDING STATUS	0.2
02/07/24	J GURULE	ICAP - ATTENTION TO CASE STRATEGY AND NEXT STEPS	0.5
02/08/24	J GURULE	ICAP - EMAIL WITH G. DYER REGARDING QUESTION	0.1
02/09/24	S INDELICATO	DRAFT CRITICAL DATES CALENDAR	1.2
02/12/24	J GURULE	CALL WITH L MILLER REGARDING STATUS	0.2
02/12/24	S INDELICATO	CONFERENCE WITH J. GURULE AND D. PEREZ REGARDING CASE STRATEGY AND STATUS	0.4
02/13/24	J GURULE	REVIEW PROFESSIONAL FEE ACCRUALS	0.1
02/13/24	J GURULE	ANALYSIS OF CASE STRATEGY AND NEXT STEPS	0.3
02/14/24	J GURULE	CALL WITH DEBTOR TEAMS REGARDING WORK STREAMS	0.5
02/16/24	J GURULE	CALL WITH K. TARAZI REGARDING UPDATES	0.5
02/20/24	J GURULE	CALL WITH L MILLER REGARDING STATUS	0.1
02/20/24	S INDELICATO	DRAFT AND REVISE WIP LIST FOR DIP MOTION AND 9019 MOTION	0.8
02/20/24	S INDELICATO	CONFERENCE WITH PALADIN REGARDING ACTION ITEMS	0.5
02/21/24	J GURULE	ATTENTION TO CASE STATUS AND STRATEGY	0.4
02/21/24	J GURULE	CALL WITH L. MILLER REGARDING STATUS	0.1
02/21/24	D PEREZ	REVIEW AND COMMENT ON BK/LIT WORK IN PROGRESS LIST	0.2
02/22/24	J GURULE	CALL WITH K. TARAZI REGARDING PREP	0.1
02/22/24	J GURULE	CALL WITH L. MILLER REGARDING STRATEGY	0.3
02/22/24	J GURULE	INTERNAL EMAILS WITH TEAM IN PREP FOR FILINGS	0.4
02/22/24	J GURULE	CALL WITH K. TARAZI REGARDING STRATEGY AND NEXT STEPS	0.3
02/22/24	S INDELICATO	DRAFT AND REVISE NOTICE OF DIP AND 9019 MOTIONS	1.4
02/27/24	J GURULE	CALL WITH UCC COUNSEL AND L. MILLER REGARDING STATUS, CONTESTED MATTERS	0.5

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/27/24	J GURULE	CALL WITH L. MILLER REGARDING STATUS	0.1
02/27/24	S INDELICATO	ATTEND WEEKLY UPDATE CALL WITH OMM, BUCHALTER, AND PALADIN (0.5); FOLLOW UP REGARDING ACTION ITEMS (0.2)	0.7
02/27/24	D PEREZ	ATTEND WEEKLY UPDATE CALL WITH OMM, BUCHALTER, AND PALADIN	0.5
02/29/24	J GURULE	CALL WITH K. TARAZI REGARDING WORK STREAMS	0.2
Total	B110 CASE ADMINISTRATION		12.3
B120 ASSET ANALYSIS & RECOVERY			
02/01/24	J GURULE	ICAP - WORK ON MOU REVISIONS AND CIRCULATE	0.6
02/01/24	J GURULE	ICAP - CALL WITH J. KORNFELD REGARDING MOU	0.5
02/02/24	J GURULE	ICAP - ATTENTION TO MOU AND 9019 ISSUES	0.3
02/02/24	S INDELICATO	DRAFT AND REVISE 9019 MOTION AND SUPPORTING DECLARATION	0.8
02/02/24	D PEREZ	REVIEW AND COMMENT ON REVISED DRAFT OF 9019 MOTION	0.3
02/04/24	J GURULE	ICAP - WORK ON L. MILLER DECLARATION, REVIEW AND REVISIONS	1.6
02/05/24	S INDELICATO	REVISE MOTION TO APPROVE COOPERATION AGREEMENT	0.7
02/06/24	J GURULE	ICAP - ATTENTION TO MOU ISSUES AND DRAFT	0.3
02/08/24	J GURULE	ICAP - CALL WITH D PEARCE REGARDING UCC MOU	0.1
02/09/24	S INDELICATO	REVIEW/ANALYZE COOPERATION AGREEMENT FOR REVISIONS TO MOTION	0.9
02/09/24	S INDELICATO	DRAFT AND REVISE MOTION TO APPROVE COOPERATION AGREEMENT	0.4
02/13/24	J GURULE	CALL WITH J. BENDER REGARDING LITIGATION	0.1
02/20/24	D PEREZ	REVIEW PONZI SCHEME OUTLINE AND BRIEF AND DRAFT PRELIMINARY STATEMENT FOR 9019 MOTION	3.0
02/20/24	M POCHA	REVIEW CASE FILES RELATED TO TURNOVER COMPLAINT, MOTION TO TERMINATE CONSULTING AGREEMENT AND PONZI ISSUES	0.7
02/21/24	P JONES	REVIEW PRELIMINARY CASE BACKGROUND DOCUMENTS	0.2
02/21/24	J GURULE	REVIEW AND COMMENT ON 9019 MOTION	0.7
02/21/24	A BAILEY	RESEARCH LEGAL REQUIREMENTS FOR A MOTION FOR TURNOVER OF PROPERTY IN ORDER TO DRAFT SAME	0.7
02/21/24	M POCHA	REVIEW DRAFTS OF PONZI BRIEF, SUPPORTING DECLARATIONS AND FINDINGS OF FACT AND CONCLUSIONS OF LAW	1.8
02/21/24	M POCHA	CONTINUE TO REVIEW CASE FILES RELATED TO TURNOVER ISSUES, TERMINATION OF CONSULTING AGREEMENT AND PONZI ISSUES	1.2

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Client: ICAP ENTERPRISES, INC.
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/21/24	P JONES	CALL WITH M. POCHA AND A. BAILEY TO DISCUSS MOTION TO TERMINATE CONSULTING AGREEMENT AND MOTION FOR TURNOVER	0.2
02/21/24	P JONES	CALL WITH M. POCHA TO DISCUSS STRATEGY AND FIRST STEPS	0.4
02/21/24	D PEREZ	REVISE 9019 MOTION REGARDING J. GURULE COMMENTS	0.8
02/22/24	M POCHA	EMAILS WITH J. GURULE REGARDING LITIGATION STRATEGY	0.6
02/22/24	M POCHA	DRAFT COMMENTS FOR TURNOVER COMPLAINT AND MOTION TO TERMINATE CONSULTING AGREEMENT	0.8
02/22/24	M POCHA	CONTINUE TO REVIEW AND COMMENT ON DRAFTS OF PONZI BRIEF AND SUPPORTING EVIDENCE	1.5
02/22/24	A BAILEY	RESEARCH WHETHER CHRISTENSEN DEFENDANTS CAN BE JOINED IN THE SAME ACTION FOR TURNOVER	0.9
02/22/24	M POCHA	REVIEW RESEARCH FOR TURNOVER COMPLAINT	0.4
02/22/24	A BAILEY	RESEARCH [REDACTED]	1.0
02/22/24	A BAILEY	[REDACTED]	
02/22/24	A BAILEY	BEGIN DRAFTING COMPLAINT FOR TURNOVER AGAINST CHRISTENSEN DEFENDANTS UNDER SECTION 542	1.2
02/22/24	D PEREZ	REVISE 9019 DECLARATION (.4); REVIEW COMMITTEE COMMENTS TO 9019 MOTION AND FOLLOW UP WITH J. GURULE REGARDING SAME (.2)	0.6
02/22/24	P JONES	DRAFT BRIEF IN SUPPORT OF PONZI FINDINGS	3.4
02/23/24	J GURULE	CORRESPONDENCE WITH INTERNAL TEAM REGARDING LAPTOP ISSUE	0.2
02/23/24	J GURULE	CALL WITH M. LESNICK AND L. MILLER REGARDING STATUS	0.5
02/23/24	J GURULE	FINAL REVIEW OF ALL 2/23 FILINGS AND RELATED COMMENTS AND EMAILS	1.0
02/23/24	M POCHA	REVIEW DIP AND 9019 COURT FILINGS	0.8
02/23/24	S INDELICATO	REVIEW AND FINALIZE MOTION TO APPROVE COOPERATION AGREEMENT	1.4
02/23/24	M POCHA	ANALYZE CASE FILES AND ISSUES TO PREPARE FOR PONZI HEARING	1.8
02/23/24	A BAILEY	RESEARCH [REDACTED]	1.5
02/23/24	M POCHA	[REDACTED]	
02/23/24	M POCHA	CONTINUE TO REVIEW AND COMMENT ON DRAFT OF PONZI BRIEF	1.0
02/23/24	M POCHA	REVIEW AND COMMENT ON DRAFT OF COMPLAINT FOR TURNOVER ADVERSARY PROCEEDING	0.6
02/23/24	P JONES	DRAFT BRIEF IN SUPPORT OF PONZI FINDINGS	4.0
02/23/24	S INDELICATO	REVISE MOTION TO APPROVE COOPERATION AGREEMENT TO ADDRESS COMMENTS	0.9

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Client: ICAP ENTERPRISES, INC.
 Matter Name: DEBTOR MATTERS
 Matter: 0409314-00001

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 Invoice: 1170684
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/24/24	P JONES	DRAFT FACTUAL BACKGROUND SECTION OF BRIEF IN SUPPORT OF PONZI FINDINGS	4.0
02/24/24	J GURULE	EMAIL WITH INTERNAL TEAM REGARDING TURNOVER	0.1
02/24/24	M POCHA	CONTINUE TO REVIEW DIP AND 9019 MOTIONS AND SUPPORTING PAPERS	0.7
02/24/24	M POCHA	REVIEW RESEARCH [REDACTED]	0.2
		[REDACTED]	
02/24/24	P JONES	DRAFT PROCEDURAL BACKGROUND SECTION OF BRIEF IN SUPPORT OF PONZI FINDINGS	2.7
02/25/24	P JONES	DRAFT LEGAL STANDARD SECTION OF BRIEF IN SUPPORT OF PONZI FINDINGS	1.0
02/25/24	M POCHA	FURTHER EDITS TO TURNOVER ADVERSARY COMPLAINT	0.3
02/25/24	D PEREZ	RESEARCH REGARDING CONTESTED MATTER V ADVERSARY PROCEEDING	0.6
02/25/24	P JONES	DRAFT ARGUMENT SECTION OF BRIEF IN SUPPORT OF PONZI FINDINGS	4.7
02/26/24	J GURULE	EMAILS WITH INTERNAL TEAM REGARDING WITNESS INTERVIEWS	0.4
02/26/24	J GURULE	ATTENTION TO PONZI BRIEF ISSUES AND RELATED CORRESPONDENCE	0.3
02/26/24	M POCHA	REVIEW AND PROVIDE COMMENTS ON REVISED DRAFT OF BRIEF REGARDING PONZI INVESTIGATION AND FINDINGS	0.8
02/26/24	M POCHA	REVIEW HO DECLARATION REGARDING PONZI FINDINGS	0.4
02/26/24	M POCHA	ANALYZE CASE FILES AND ISSUES TO PREPARE FOR PONZI HEARING	2.3
02/26/24	P JONES	DRAFT ARGUMENT SECTION OF BRIEF IN SUPPORT OF PONZI FINDINGS	3.2
02/26/24	D PEREZ	RESEARCH REGARDING CONTESTED MATTER V ADVERSARY PROCEEDING FOR PONZI FINDINGS (.7); EMAILS WITH S. INDELICATO REGARDING SAME (.1)	0.8
02/27/24	A BAILEY	RESEARCH [REDACTED]	1.9
		[REDACTED]	
02/27/24	J GURULE	REVIEW C CHRISTENSEN CORRESPONDENCE AND RELATED ISSUES	0.2
02/27/24	P JONES	CALL WITH L. MILLER, J. GURULE, M. POCHA, K. TARAZI, AND A. BAILEY REGARDING MOTION FOR TERMINATION AND MOTION TO TURNOVER	1.1
02/27/24	P JONES	REVIEW AND REVISE COMPLAINT FOR TURNOVER	0.2
02/27/24	J GURULE	CALL WITH TEAM REGARDING TURNOVER AND CONSULTING AGREEMENT (PARTIAL)	1.0
02/27/24	J GURULE	ANALYSIS OF LIT STRATEGY	0.4
02/27/24	J GURULE	ATTENTION AND INTERNAL CORRESPONDENCE REGARDING PONZI BRIEF	0.2

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/27/24	M POCHA	REVIEW AND PROVIDE COMMENTS FOR REVISED DRAFT OF TURNOVER ADVERSARY COMPLAINT	0.8
02/27/24	M POCHA	CALL WITH J. GURULE TO DISCUSS STRATEGY FOR TURNOVER COMPLAINT, MOTION TO TERMINATE AND DIP HEARING	0.3
02/27/24	M POCHA	REVIEW CORRESPONDENCE WITH CHRIS CHRISTENSEN TO SUPPORT MOTION TO TERMINATE CONSULTING AGREEMENT	0.3
02/27/24	M POCHA	REVIEW OPEN FACTUAL QUESTIONS FOR TURNOVER COMPLAINT AND MOTION TO TERMINATE	0.6
02/27/24	M POCHA	REVIEW JURISDICTION AND BANKRUPTCY LAW ARGUMENTS FOR PONZI BRIEF	0.3
02/27/24	M POCHA	CONFERENCE (PARTIAL) WITH L. MILLER, J. GURULE, P. JONES, A. BAILEY AND K. TARAZI REGARDING STRATEGY FOR TURNOVER COMPLAINT AND MOTION TO TERMINATE CONSULTING AGREEMENT	0.7
02/27/24	M POCHA	DRAFT COMMENTS FOR STRATEGY FOR TURNOVER COMPLAINT AND MOTION TO TERMINATE CHRISTENSEN CONSULTING AGREEMENT	0.4
02/27/24	J GURULE	CALL WITH L. MILLER REGARDING LIT STRATEGY	0.4
02/27/24	J GURULE	EMAILS WITH M. POCHA REGARDING LITIGATION STRATEGY	0.4
02/27/24	D PEREZ	PONZI FINDINGS RESEARCH (4.4); DRAFT [REDACTED] (3.2)	7.6
02/28/24	J GURULE	REVIEW AND CIRCULATE PONZI BRIEF	0.4
02/28/24	J GURULE	DRAFT EMAIL TO J. CHRISTENSENS LAWYER	0.3
02/28/24	J GURULE	MEETING WITH TEAM, L. MILLER, UCC REGARDING CHRISTENSEN INTERVIEW	0.6
02/28/24	M POCHA	CONFER WITH P. JONES AND A. BAILEY ON STRATEGY FOR HEARING ON PONZI MOTION, TURNOVER COMPLAINT AND MOTION TO TERMINATE	0.8
02/28/24	M POCHA	REVIEW AND REVISE EMAILS TO OPPOSING COUNSEL REGARDING JIM AND CHRIS CHRISTENSEN	0.4
02/28/24	M POCHA	REVIEW COMMENTS FROM COUNSEL FOR UCC FOR PONZI BRIEF	0.2
02/28/24	M POCHA	OUTLINE INTERVIEW QUESTIONS FOR CHRIS CHRISTENSEN	0.6
02/28/24	M POCHA	REVIEW FURTHER REVISED DRAFT OF BRIEF TO SUPPORT PONZI FINDINGS	0.4
02/28/24	J DENEVE	REVIEW AND REVISE DRAFT EMAIL TO J. CHRISTENSEN'S COUNSEL REGARDING CONTACT WITH PARTIES	0.2
02/28/24	J DENEVE	CONFER WITH L. MILLER, K. TARAZI, M. POCHA, AND J. GURULE REGARDING DEVELOPMENTS WITH CHRISTENSENS	0.3
02/28/24	M POCHA	CONFERENCE WITH J. GURULE, L. MILLER, K. TARAZI AND J. DENEVE REGARDING CASE STRATEGY	0.7

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/28/24	M POCHA	CONFER WITH L. MILLER AND J. GURULE REGARDING PLAN FOR MARCH 27 HEARING	0.5
02/28/24	M POCHA	REVIEW ADDITIONAL FACTUAL EVIDENCE AND SUPPORT FOR MOTION TO TERMINATE CONSULTING AGREEMENT AND PONZI BRIEF	1.3
02/28/24	D PEREZ	REVIEW COMMENTS TO PONZI BRIEF REGARDING [REDACTED] (.2); EMAILS WITH UCC COUNSEL AND OMM TEAM REGARDING SAME (.2)	0.4
02/28/24	J GURULE	CALL WITH M. POCHA AND L. MILLER REGARDING LITIGATION STRATEGY	0.5
02/28/24	P JONES	CONTINUE DRAFTING ARGUMENT SECTION OF BRIEF IN SUPPORT OF PONZI FINDINGS BASED ON ADDITIONAL INFORMATION, INCLUDING HO DECLARATION AND BANKRUPTCY CODE ARGUMENTS	3.6
02/28/24	M POCHA	CONFER WITH L. MILLER AND J. GURULE, J. BENDER, S. HO, L. GONZALEZ, AND J. KORNFELD REGARDING INTERVIEW WITH CHRIS CHRISTENSEN	0.6
02/29/24	J GURULE	EMAILS WITH M POCHA REGARDING LITIGATION STRATEGY	0.3
02/29/24	J GURULE	REVIEW AND CORRESPONDENCE REGARDING PONZI BRIEF	0.4
02/29/24	M POCHA	CONFERENCE AND EMAILS WITH J. GURULE REGARDING CASE STRATEGY	0.8
02/29/24	A BAILEY	DRAFT QUESTIONS FOR INTERVIEW OF CHRISTENSEN PURSUANT TO CONSULTING AGREEMENT RELATED TO USE OF LAPTOP TO COMMUNICATE WITH COUNSEL	0.9
02/29/24	M POCHA	CONTINUE TO REVIEW FACTUAL EVIDENCE AND SUPPORT FOR MOTION TO TERMINATE CONSULTING AGREEMENT AND PONZI BRIEF	0.6
02/29/24	M POCHA	REVIEW AND COMMENT ON MOTION TO EXPEDITE AND REVISED TURNOVER ADVERSARY COMPLAINT	0.5
02/29/24	A BAILEY	CONTINUE DRAFTING MOTION TO EXPEDITE SCHEDULES ON DIP AND 9109 MOTIONS	2.0
02/29/24	A BAILEY	DRAFT MOTION TO EXPEDITE HEARING AND MOTIONS ON COMPLAINT FOR TURNOVER (.8); REVISE COMPLAINT FOR TURNOVER (1.3)	2.1
02/29/24	J GURULE	CALL WITH L. MILLER REGARDING STRATEGY	0.2
02/29/24	M POCHA	ASSESS STRATEGY REGARDING INTERVIEW REQUEST TO CHRIS CHRISTENSEN	0.2
Total	B120 ASSET ANALYSIS & RECOVERY		99.5
B130 ASSET DISPOSITION			
02/14/24	J GURULE	CALL WITH REAL ESTATE TEAM REGARDING SENZA AUCTION	0.5
02/14/24	J GURULE	ANALYSIS AND EMAILS WITH TEAM REGARDING SENZA QUESTION	0.2
02/14/24	D PEREZ	CALL WITH PALADIN, BUCHALTER, AND J. GURULE REGARDING SENZA SALE LOGISTICS	0.5

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/24/24	J GURULE	INTERNAL EMAILS REGARDING SENZA ISSUES	0.2
02/24/24	J GURULE	CALL WITH K. TARAZI REGARDING SENZA SALE	0.2
02/26/24	J GURULE	CALL WITH K. TARAZI REGARDING SALE	0.2
02/27/24	J GURULE	CALL WITH K. TARAZI REGARDING SALE ISSUE	0.3
02/28/24	J GURULE	TELEPHONE CALL WITH K. TARAZI REGARDING SALE	0.1
02/29/24	J GURULE	PREP FOR SENZA AUCTION, RELATED CORRESPONDENCE	0.8
02/29/24	J GURULE	CALL WITH K. TARAZI REGARDING AUCTION	0.1
Total	B130 ASSET DISPOSITION		3.1
B140 RELIEF FROM STAY PROCEEDINGS			
02/29/24	D PEREZ	REVIEW NEW MOTIONS FOR RELIEF FROM STAY AND FOLLOW UP WITH S. INDELICATO REGARDING SAME	0.3
02/29/24	S INDELICATO	REVIEW/ANALYZE MOTIONS FOR RELIEF FROM STAY	1.8
Total	B140 RELIEF FROM STAY PROCEEDINGS		2.1
B150 MEETINGS OF & COMMUNICATION W/ CREDITORS			
02/01/24	J GURULE	ICAP - MEETINGS UCC ADVISORS	1.0
02/05/24	J GURULE	ICAP - ANALYSIS OF EMAILS WITH J. KORNFIELD AND UCC MEETING PREP	0.4
02/06/24	J GURULE	ICAP - MEETINGS WITH UCC ADVISORS IN CONNECTION WITH COMMITTEE CONFERENCE	1.2
02/06/24	J GURULE	ICAP - EMAILS WITH UCC ADVISORS REGARDING MEETING	0.3
02/06/24	J GURULE	ICAP - PREP FOR UCC MEETING	0.5
02/06/24	J GURULE	ICAP - ATTEND IN PERSON MEETING WITH CREDITORS COMMITTEE	3.5
02/07/24	J GURULE	ICAP - CALL WITH COLPITTS DEFENDANTS AND COMMITTEE REGARDING ISSUES	0.3
02/13/24	J GURULE	CALL WITH J. KORNFIELD REGARDING OPEN ITEMS, DIP, LITIGATION	0.7
02/20/24	J GURULE	CALL WITH DEBTOR AND COMMITTEE TEAMS REGARDING WORK STREAMS	1.0
02/23/24	J GURULE	REVIEW INVESTOR COMMUNICATION	0.1
02/26/24	J GURULE	CALL WITH J. KORNFIELD REGARDING STRATEGY	0.4
Total	B150 MEETINGS OF & COMMUNICATION W/ CREDITORS		9.4
B160 FEE/EMPLOYMENT APPLICATIONS			
02/01/24	D PEREZ	ATTEND TO CONFLICTS ANALYSIS	2.1
02/02/24	D PEREZ	ATTEND TO CONFLICTS ANALYSIS (1.7); REVIEW AND COMMENT ON DRAFT DECLARATION IN SUPPORT OF OMM RETENTION (.6)	2.3
02/05/24	D PEREZ	REVIEW AND COMMENT ON DRAFT DECLARATION IN SUPPORT OF OMM RETENTION	1.9

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02/06/24	J GURULE	ICAP REVIEW AND COMMENT ON EMPLOYMENT APP AND ENGAGEMENT LETTER	0.3
02/06/24	D PEREZ	FINALIZE OMM RETENTION APPLICATION AND DECLARATION ISO SAME	1.2
02/07/24	J GURULE	ICAP - FINALIZE EMPLOYMENT APPLICATIONS	0.2
02/07/24	D PEREZ	FINALIZE OMM RETENTION APPLICATION AND PREPARE SAME FOR FILING	0.7
Total	B160 FEE/EMPLOYMENT APPLICATIONS		8.7
B180 AVOIDANCE ACTION ANALYSIS			
02/01/24	J GURULE	ICAP - REVIEW AND REVISE LAPTOP ISSUES REGARDING JIM CHRISTENSEN	0.3
02/01/24	J GURULE	ICAP - CALL WITH M. LESNICK AND LITIGATION TEAM REGARDING LAPTOP AND SUBPOENA RESPONSE	0.4
02/02/24	J GURULE	ICAP EMAILS WITH J. BENDER REGARDING DISCOVERY	0.1
02/06/24	J GURULE	ICAP TELEPHONE CALL WITH D MARK REGARDING LITIGATION STRATEGY	0.3
02/07/24	J GURULE	ICAP -CALL WITH L. MILLER REGARDING LITIGATION	0.2
02/08/24	J GURULE	ICAP -TELEPHONE CALL WITH D MARK REGARDING LITIGATION REPORTS	0.1
02/08/24	J GURULE	ICAP - CALL WITH L MILLER REGARDING LITIGATION STRATEGY	0.2
02/12/24	J GURULE	CALL WITH L. MILLER REGARDING LITIGATION ISSUES	0.1
02/12/24	J GURULE	CALL WITH D MARK REGARDING OPEN LITIGATION ITEMS	0.4
02/12/24	J GURULE	ATTENTION TO COLPITS ISSUES	0.5
02/12/24	J GURULE	CALL WITH J. BENDER REGARDING LITIGATION STATUS	0.2
02/13/24	J GURULE	CORRESPONDENCE WITH UCC REGARDING LITIGATION WORK STREAMS	0.2
02/13/24	J GURULE	ANALYSIS OF LITIGATION CLAIMS WORK SHEET AND STRATEGY	0.6
02/13/24	J GURULE	CALL WITH D. MARK REGARDING LITIGATION STRATEGY	0.5
02/14/24	J GURULE	EMAIL WITH TEAM REGARDING TURNOVER MOTION	0.1
02/14/24	J GURULE	OUTLINE OF AVOIDANCE CLAIM ISSUES	0.4
02/15/24	J GURULE	CALL WITH L. MILLER REGARDING LITIGATION STATUS	0.2
02/15/24	J GURULE	CALL WITH [REDACTED] REGARDING FRAUDULENT TRANSFER CLAIMS	0.4
02/15/24	J GURULE	ATTENTION TO LITIGATION STRATEGY	0.8
02/16/24	J GURULE	EMAILS WITH UCC REGARDING BROKER QUESTION	0.1
02/20/24	J GURULE	REVIEW AND CORRESPONDENCE INTERNALLY REGARDING TURNOVER ISSUES	0.3
02/20/24	J GURULE	CALL WITH M. POCHA REGARDING CASE BACKGROUND AND LITIGATION ITEMS	1.0

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02/20/24	M POCHA	CALLS WITH J. GURULE TO DISCUSS CASE STRATEGY	1.0
02/21/24	J GURULE	EMAILS WITH LITIGATION TEAM REGARDING FILINGS (.3); ATTENTION TO SAME (.7)	1.0
02/21/24	J GURULE	CALL WITH M. POCHA REGARDING LITIGATION STREAMS	0.8
02/21/24	M POCHA	CONFERENCE AND EMAILS WITH J. GURULE REGARDING LITIGATION STRATEGY	0.8
02/22/24	J GURULE	EMAILS WITH INTERNAL TEAM REGARDING LITIGATION	0.2
02/24/24	J GURULE	ANALYSIS OF AVOIDANCE STATUS AND NEXT STEPS	0.3
02/26/24	J GURULE	CALL WITH BUCHALTER EXPERT TEAM	1.2
02/26/24	J GURULE	ANALYSIS OF STRATEGY AND NEXT STEPS	0.3
02/28/24	J GURULE	DRAFT EMAIL TO M. LESNICK REGARDING LITIGATION	0.2
02/28/24	J GURULE	CALL WITH L MILLER REGARDING LITIGATION	0.2
02/29/24	J GURULE	CALL WITH D. MARK REGARDING EXPERT ISSUES AND LITIGATION STRATEGY	0.5
Total	B180 AVOIDANCE ACTION ANALYSIS		13.9

B190 OTHER CONTESTED MATTERS

02/01/24	J GURULE	ICAP - CALL WITH J. KORNFELD REGARDING SUBPOENA	0.1
02/01/24	J GURULE	ICAP - CALL WITH STATE REGARDING SUBPOENA RESPONSE	0.2
02/01/24	J GURULE	ICAP - EMAIL WITH J. BENDER REGARDING LITIGATION ISSUES	0.1
02/01/24	J GURULE	ICAP - ATTENTION TO CONSULTING AGREEMENT ISSUES	0.2
02/01/24	J GURULE	ICAP - REVIEW SUBPOENA RELATED ISSUES AND CORRESPONDENCE	0.3
02/05/24	J GURULE	ICAP - CALL WITH BILL AT SEC REGARDING SUBPOENA	0.1
02/06/24	J GURULE	ICAP - EMAIL WITH SEC REGARDING SUBPOENA	0.1
02/06/24	J GURULE	ICAP - EMAILS WITH SEC AND RELATED STRATEGY	0.3
02/07/24	J GURULE	ICAP - CALL WITH J DENEVE REGARDING MATTER SEC ISSUES	0.5
02/07/24	J GURULE	ICAP - WORK AND CORRESPONDENCE REGARDING SEC ISSUES	0.3
02/07/24	J DENEVE	CONFER WITH J. GURULE REGARDING SEC INVESTIGATION BACKGROUND(.5); REVIEW BACKGROUND INFO REGARDING SAME (.2)	0.7
02/08/24	J GURULE	ICAP - SUBPOENA CALL WITH SEC	0.4
02/12/24	J GURULE	CALL WITH K. TARAZI REGARDING OPEN ITEMS	0.2
02/13/24	J GURULE	REVIEW M. LESNICK LETTER TO [REDACTED]	0.1
02/14/24	J GURULE	EMAIL WITH J. KORNFELD REGARDING 9019	0.1
02/15/24	J GURULE	REVIEW AND ANALYSIS OF CONSULTING AGREEMENT AND RELATED ISSUES	0.3

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02/15/24	J GURULE	EMAIL WITH SEC REGARDING STATUS	0.1
02/15/24	J GURULE	CALL WITH J. DENEVE REGARDING SEC ISSUES	0.3
02/15/24	J GURULE	CALL WITH J. DENEVE, L. MILLER, D. PEREZ REGARDING STATUS, SEC AND EMAIL ISSUES	0.4
02/15/24	J GURULE	EMAILS WITH J DENEVE REGARDING STATUS	0.3
02/15/24	J DENEVE	CONFER WITH J. GURULE REGARDING UPDATE ON CASE AND CONTACT WITH THE SEC	0.3
02/15/24	J DENEVE	CONFER WITH L. MILLER, J. GURULE, AND D. PEREZ REGARDING DEBTOR'S INVESTIGATION AND SEC COMMUNICATIONS	0.4
02/15/24	D PEREZ	CALL WITH J. GURULE, J. DENEVE, AND L. MILLER REGARDING SEC ISSUES (.3); FOLLOW UP EMAILS WITH SAME (.2)	0.5
02/15/24	J GURULE	EMAILS WITH L. MILLER AND TEAM REGARDING SEC ISSUES	0.2
02/16/24	J GURULE	REVIEW AND ANALYSIS OF STRATEGY AND WORK STREAMS	0.4
02/16/24	J GURULE	EMAILS WITH SEC REGARDING STATUS	0.1
02/21/24	J GURULE	EMAILS WITH SEC REGARDING STATUS	0.2
02/21/24	J GURULE	CALL WITH J. DENEVE, L. MILLER, J. BENDER, M. LANG REGARDING SEC ISSUES	0.6
02/21/24	A BAILEY	CALL WITH M. POCHA AND P. JONES REGARDING MOTION FOR TURNOVER AND MOTION TO TERMINATE CONSULTING AGREEMENT	0.2
02/21/24	J DENEVE	CONFER WITH L. MILLER, J. BENDER, M. LANG, AND J. GURULE REGARDING PREPARING FOR CALL WITH SEC RELATED TO DEBTOR'S INVESTIGATION	0.4
02/21/24	J DENEVE	REVIEW AND ANALYZE SEC SUBPOENA	0.3
02/22/24	J GURULE	PREP FOR CALL WITH SEC REGARDING DEBTOR FILINGS AND INVESTIGATION	0.2
02/22/24	J GURULE	CALL WITH SEC REGARDING STATUS	0.6
02/22/24	J GURULE	CALL WITH G DYER REGARDING SEC ISSUES	0.5
02/22/24	J GURULE	PREPARE SEC TALKING POINTS REGARDING DEBTOR FILINGS AND INVESTIGATION	0.2
02/22/24	J DENEVE	REVIEW AND REVISE TALKING POINTS FOR CALL WITH SEC REGARDING UPCOMING DEBTOR FILINGS AND PONZI SCHEME INVESTIGATION	0.4
02/22/24	J DENEVE	PARTICIPATE IN CALL WITH SEC STAFF, INCLUDING L. MILLER J. GURULE, AND J. BENDER REGARDING DISCLOSURE TO SEC OF DEBTOR'S FILING AND INVESTIGATION RESULTS	0.6
02/22/24	J GURULE	PREP FOR STATUS CONFERENCE	0.3
02/23/24	J GURULE	CALL WITH L. MILLER REGARDING FILINGS	0.1
02/23/24	J GURULE	CALL WITH L. MILLER REGARDING STRATEGY	0.5

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02/23/24	J GURULE	CALL WITH K. TARAZI REGARDING FILINGS	0.1
02/23/24	J GURULE	CALL WITH K. TARAZI REGARDING FILINGS	0.1
02/23/24	J GURULE	CALL WITH L. MILLER REGARDING NEXT STEPS	0.2
02/23/24	J GURULE	CALL WITH K. TARAZI REGARDING SERVICE QUESTION	0.1
02/23/24	J GURULE	CORRESPONDENCE WITH M. LESNICK REGARDING STATUS	0.1
02/24/24	J GURULE	EMAIL TO SEC REGARDING FILINGS	0.1
02/26/24	P JONES	DRAFT MOTION TO TERMINATE CONSULTING AGREEMENT WITH CHRIS CHRISTENSEN	4.3
02/26/24	M POCHA	REVIEW FACTUAL BACKGROUND TO SUPPORT MOTION TO TERMINATE CHRISTENSEN CONSULTING AGREEMENT	0.6
02/26/24	A BAILEY	CONTINUE DRAFTING COMPLAINT FOR TURNOVER OF PROPERTY AGAINST CHRISTENSEN DEFENDANTS	1.0
02/26/24	S INDELICATO	DRAFT AND REVISE ARGUMENT REGARDING CONTESTED MATTER VS ADVERSARY PROCEEDING	0.9
02/26/24	S INDELICATO	RESEARCH REGARDING CONTESTED MATTER VS ADVERSARY PROCEEDING	1.2
02/27/24	J GURULE	CORRESPONDENCE AND REVIEW MATERIALS FROM SEC	0.2
02/27/24	S INDELICATO	FURTHER RESEARCH REGARDING SCOPE OF CONTESTED MATTER	0.9
02/27/24	A BAILEY	CALL WITH L. MILLER, M. POCHA, J. GURULE, P. JONES, AND K. TAHRIZI REGARDING STRATEGY FOR MOTION TO TERMINATE CONSULTING AGREEMENT	1.0
02/27/24	J DENEVE	REVIEW NEW SUBPOENA FROM SEC	0.2
02/27/24	S INDELICATO	RESEARCH REGARDING [REDACTED]	1.3
02/27/24	S INDELICATO	DRAFT AND REVISE ARGUMENT REGARDING CONTESTED MATTER VS ADVERSARY PROCEEDING	1.2
02/28/24	J GURULE	LITIGATION TEAM CALL REGARDING JIM CHRISTENSEN	0.5
02/28/24	J GURULE	CALL WITH J. DENEVE AND [REDACTED] REGARDING DEBTOR FILINGS	0.2
02/28/24	P JONES	CALL WITH A. BAILEY AND M. POCHA REGARDING PLAN FOR CHRISTENSEN INTERVIEW, MOTION FOR TERMINATION, AND TURNOVER COMPLAINT	0.8
02/28/24	A BAILEY	REVIEW FILES FROM L. MILLER ON SALLY VAULT GROUND FOR TERMINATION OF CONSULTING AGREEMENT	0.2
02/28/24	J DENEVE	CONFER WITH J. GURULE AND [REDACTED] REGARDING DEBTOR'S FILINGS (.2); PREPARE FOR SAME (.1)	0.3
02/28/24	A BAILEY	CALL WITH M. POCHA AND P. JONES REGARDING STRATEGY FOR MOTION TO EXPEDITE	0.8
02/28/24	A BAILEY	BEGIN DRAFTING MOTION TO EXPEDITE AND SET HEARING ON TERMINATION MOTION	2.3
02/29/24	J GURULE	CORRESPONDENCE WITH M. LESNICK REGARDING INTERVIEW AND REVIEW RELATED ISSUES	0.4

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02/29/24	J GURULE	CALL WITH M. LESNICK REGARDING TERMINATION	0.1
02/29/24	S PEREZ	REVIEW SUPPLEMENTAL BRIEF REGARDING PONZI SCHEME FINDINGS TO CONFIRM BLUE BOOK FORMAT OF CASE REFERENCES AND CONFIRM ACCURACY OF QUOTATIONS, PAGE, PARAGRAPH AND FACT REFERENCES.	1.8
02/29/24	P JONES	DRAFT ARGUMENT SECTION OF MOTION TO TERMINATE CONSULTING AGREEMENT WITH CHRIS CHRISTENSEN	0.7
02/29/24	P JONES	DRAFT BACKGROUND SECTION TO MOTION TO TERMINATE CONSULTING AGREEMENT WITH CHRIS CHRISTENSEN	2.9
02/29/24	P JONES	REVIEW PRIOR DECLARATIONS AND COMPANY RECORDS TO PREPARE MOTION FOR TERMINATION OF CONSULTING AGREEMENT WITH CHRIS CHRISTENSEN	2.2
Total	B190 OTHER CONTESTED MATTERS		38.8
B195 NON-WORKING TRAVEL			
02/06/24	J GURULE	ICAP - TRAVEL TO SEA FOR IN PERSON MEETING WITH CREDITORS' COMMITTEE	3.0
02/07/24	J GURULE	ICAP - TRAVEL BACK FROM SEATTLE FROM IN PERSON MEETING WITH UCC	2.5
Total	B195 NON-WORKING TRAVEL		5.5
B230 FINANCING/CASH COLLATERAL			
02/01/24	S INDELICATO	DRAFT AND REVISE LITIGATION DIP ORDER	3.1
02/01/24	S INDELICATO	RESEARCH PRECEDENT PROVISIONS FOR LITIGATION DIP ORDER	1.9
02/01/24	S INDELICATO	DRAFT AND REVISE LITIGATION DIP MOTION	1.9
02/02/24	D PEREZ	REVIEW DRAFT DIP AGREEMENT (.6); REVIEW AND COMMENT ON DRAFT DIP ORDER (1.1)	1.7
02/02/24	J GURULE	ICAP - CALL WITH L. MILLER REGARDING STATUS AND DIP	0.5
02/02/24	S INDELICATO	FURTHER REVISE LITIGATION DIP ORDER	1.2
02/02/24	S INDELICATO	DRAFT AND REVISE LITIGATION DIP MOTION	2.1
02/03/24	S INDELICATO	DRAFT AND REVISE DIP MOTION	2.6
02/04/24	J GURULE	ICAP - CALL WITH E REUBEL REGARDING FINANCING	0.2
02/05/24	J GURULE	ICAP - ATTENTION TO DIP CORRESPONDENCE AND STRATEGY	0.4
02/05/24	S INDELICATO	REVISE DIP ORDER TO ADDRESS AND INCORPORATE COMMENTS	0.4
02/05/24	S INDELICATO	RESEARCH POTENTIAL DIP PROVISIONS	1.8
02/06/24	J GURULE	ICAP - CORRESPONDENCE AND ANALYSIS REGARDING DIP RELATED ISSUES	0.4
02/06/24	S INDELICATO	RESEARCH POTENTIAL DIP PROVISIONS REGARDING LENDER RIGHTS	2.2
02/07/24	J GURULE	ICAP - CALL WITH L. MILLER REGARDING DIP STATUS	0.1

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02/07/24	J GURULE	ICAP - CALL WITH E REUBEL REGARDING DIP LOAN	0.2
02/07/24	J GURULE	ICAP - DILIGENCE CALL WITH DIP LENDER	0.9
02/08/24	J GURULE	ICAP - EMAILS REGARDING DIP AND RELATED ISSUES	0.6
02/08/24	J GURULE	ICAP - EMAILS WITH DIP LENDERS REGARDING DIP STATUS	0.2
02/08/24	J GURULE	ICAP - TELEPHONE CALL WITH L. MILLER REGARDING DIP STATUS	0.4
02/08/24	J GURULE	ICAP - ANALYSIS OF DIP STATUS AND STRATEGY	0.4
02/08/24	J GURULE	ICAP - CALL WITH POTENTIAL DIP LENDER AND COUNSEL REGARDING DIP FINANCING	0.5
02/09/24	J GURULE	ICAP CALL WITH L KOTLER REGARDING DIP FINANCING	0.5
02/09/24	J GURULE	ICAP - CALL WITH D. PEREZ AND S. INDELICATO REGARDING STATUS, OPEN ITEMS	0.5
02/09/24	J GURULE	ICAP - CALL WITH E REUBEL REGARDING DIP FINANCING	0.1
02/09/24	J GURULE	ICAP - ATTENTION TO DIP RELATED ISSUES	0.7
02/09/24	S INDELICATO	CONFERENCE CALL WITH J. GURULE AND D. PEREZ REGARDING DIP/9019 MOTIONS (.5); FOLLOW UP WITH SAME REGARDING STATUS OF MOTIONS (.2)	0.7
02/09/24	D PEREZ	CALL WITH J. GURULE AND S. INDELICATO REGARDING MOU AND DIP UPDATE (.5); FOLLOW UP WITH S. INDELICATO REGARDING SAME (.2); REVIEW LATEST DRAFT OF DIP CREDIT AGREEMENT AND TERM SHEET (.4)	1.1
02/09/24	S INDELICATO	REVIEW/ANALYZE COMMENTS TO DIP AGREEMENT	1.6
02/12/24	J GURULE	CALL WITH DIP LENDER AND COUNSEL REGARDING TERMS AND STRATEGY	0.8
02/12/24	J GURULE	CORRESPONDENCE REGARDING DIP AND REVIEW WORK FEE DRAFT	0.3
02/12/24	J GURULE	ATTENTION TO DIP CLAIMS ISSUES AND NEXT STEPS	0.4
02/12/24	J GURULE	CALL WITH DIP LENDER COUNSEL REGARDING OPEN ISSUES	0.2
02/12/24	J GURULE	CALL WITH D. PEREZ AND S. INDELICATO REGARDING DIP UPDATES	0.3
02/12/24	D PEREZ	REVIEW AND COMMENT ON DIP TERM SHEET (.6); CALL WITH OMM TEAM REGARDING DIP MOTION/AGREEMENT (.3); CALL WITH DUNDON ADVISORS, L. MILLER, AND J. GURULE REGARDING POTENTIAL DIP (PARTIAL) (.7)	1.6
02/13/24	J GURULE	ATTENTION TO DIP STRUCTURE AND RELATED EMAILS	0.4
02/13/24	J GURULE	ICAP - TELEPHONE CALL WITH POTENTIAL DIP LENDERS REGARDING CLAIMS	0.6
02/13/24	J GURULE	CORRESPONDENCE WITH POTENTIAL DIP LENDER REGARDING STATUS	0.3
02/13/24	D PEREZ	REVISE DIP TERM SHEET	0.3
02/14/24	J GURULE	CALL WITH L. MILLER REGARDING CASE STATUS AND DIP	0.4

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/14/24	J GURULE	REVIEW EMAIL COMMENTS AND CORRESPONDENCE WITH TEAM REGARDING DIP LOAN AGREEMENT	0.2
02/14/24	J GURULE	ATTENTION TO DIP DOCUMENTS AND STRATEGY	0.5
02/15/24	S INDELICATO	DRAFT AND REVISE ICAP LITIGATION DIP ORDER	0.8
02/16/24	J GURULE	ATTENTION TO DIP LOAN ISSUES AND STATUS	0.4
02/16/24	J GURULE	CALL WITH POTENTIAL DIP LENDER GROUP REGARDING DIP FINANCING	1.1
02/16/24	S INDELICATO	REVISE SUPPLEMENTAL DIP ORDER	2.4
02/16/24	D PEREZ	REVIEW AND COMMENT ON REVISED DIP ORDER	1.1
02/17/24	J GURULE	CALL WITH L. MILLER REGARDING DIP STRATEGY	0.4
02/17/24	J GURULE	REVIEW AND REVISIONS TO DIP ORDER AND CIRCULATE TO TEAM	0.7
02/18/24	S INDELICATO	DRAFT AND REVISE LITIGATION DIP ORDER	0.9
02/18/24	D PEREZ	REVISE DIP ORDER	1.1
02/18/24	J GURULE	CALL WITH L. MILLER REGARDING DIP TERMS	0.1
02/19/24	J GURULE	ATTENTION TO DIP ISSUES AND RELATED CORRESPONDENCE	0.7
02/20/24	J GURULE	TEAM CALL REGARDING TURN OF DIP LOAN AGREEMENT AND ORDER	0.5
02/20/24	J GURULE	INTERNAL TEAM CALL REGARDING ACTION ITEMS	0.3
02/20/24	J GURULE	CALL WITH K. TARAZI REGARDING CALENDAR	0.1
02/20/24	S INDELICATO	DRAFT AND REVISE INTRO FOR SUPPLEMENTAL DIP MOTION	0.9
02/20/24	S INDELICATO	REVIEW/ANALYZE DIP AGREEMENT	1.2
02/20/24	D PEREZ	CALL WITH L. MILLER, K. TARAZI, D. KATZ, M. LANG, AND J. GURULE REGARDING DIP UPDATE (.5); ATTEND WEEKLY UPDATE CALL WITH COMMITTEE COUNSEL (.7); FOLLOW UP CALL WITH OMM TEAM (.3); FURTHER FOLLOW UP WITH S. INDELICATO REGARDING SAME (.1)	1.6
02/20/24	S INDELICATO	REVIEW/ANALYZE PONZI BRIEF IN CONNECTION WITH SUPPLEMENTAL DIP FINDINGS	1.6
02/20/24	S INDELICATO	DRAFT AND REVISE SUPPLEMENTAL DIP MOTION	3.2
02/20/24	S INDELICATO	CONFERENCE WITH J. GURULE AND D. PEREZ REGARDING DIP MOTION AND 9019 MOTION (0.3); FOLLOW UP WITH D. PEREZ REGARDING SAME (.1); FURTHER FOLLOW UP REGARDING SAME (.1)	0.5
02/21/24	J GURULE	CALL WITH V RUBINSTEIN REGARDING STATUS	0.1
02/21/24	J GURULE	DRAFT DIP ORDER FINDINGS	0.7
02/21/24	J GURULE	REVIEW AND CORRESPONDENCE REGARDING DIP TRANSACTION DOCUMENTS	0.4
02/21/24	J GURULE	CALL WITH L. MILLER REGARDING DIP	0.3
02/21/24	J GURULE	EMAILS WITH V RUBINSTEIN REGARDING DIP	0.1

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Beneficiary: O'Melveny & Myers LLP, Account No.: #4078-0224

Please include 0409314-00001 / 1170684 number in Advice

EXHIBIT B

Client: ICAP ENTERPRISES, INC.
Matter Name: DEBTOR MATTERS
Matter: 0409314-00001

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/21/24	J GURULE	CORRESPONDENCE WITH TEAM REGARDING DIP	0.1
02/21/24	S INDELICATO	REVIEW/ANALYZE L. MILLER DECLARATION IN SUPPORT OF SUPPLEMENTAL DIP MOTION	0.3
02/21/24	S INDELICATO	REVIEW REVISED DIP AGREEMENT	0.8
02/21/24	S INDELICATO	CALL WITH BUCHALTER AND OMM TEAM REGARDING DIP AGREEMENT UPDATE	1.0
02/21/24	S INDELICATO	DRAFT AND REVISE SUPPLEMENTAL DIP MOTION	3.4
02/21/24	D PEREZ	REVIEW REVISED CREDIT AGREEMENT (.2); REVIEW AND COMMENT ON DRAFT DIP MOTION (1.9); CALL WITH BUCHALTER AND OMM TEAM REGARDING DIP AGREEMENT UPDATE (1.0); REVIEW AND COMMENT ON REVISED DIP MOTION (.5); REVISE DIP ORDER REGARDING SAME (.3); EMAILS WITH OMM AND BUCHALTER TEAMS REGARDING SAME (.2)	4.1
02/22/24	J GURULE	ANALYSIS AND COMMENTS TO FINAL TURNS OF DIP ORDERS AND CREDIT DOCUMENTS	0.6
02/22/24	S INDELICATO	REVIEW FINAL TAX ORDER FOR DIP ISSUE	0.3
02/22/24	S INDELICATO	REVISE SUPPLEMENTAL DIP ORDER REGARDING PONZI FINDINGS	1.3
02/22/24	S INDELICATO	DRAFT AND REVISE DECLARATION IN SUPPORT OF SUPPLEMENTAL DIP MOTION	0.8
02/22/24	S INDELICATO	DRAFT AND REVISE SUPPLEMENTAL DIP ORDER AND MOTION	3.4
02/22/24	D PEREZ	REVIEW AND COMMENT ON PONZI SCHEME FINDINGS IN DIP ORDER (1.1); REVIEW AND COMMENT ON COMBINED NOTICE OF DIP AND 9019 MOTION (.3); CALL WITH J. GURULE REGARDING STRATEGY (.3); FOLLOW UP CALL WITH S. INDELICATO REGARDING SAME (.1)	1.8
02/22/24	J GURULE	CALL WITH D PEREZ REGARDING STRATEGY	0.3
02/23/24	J GURULE	FINAL REVIEW OF DIP ISSUES	0.4
02/23/24	S INDELICATO	REVISE SUPPLEMENTAL DIP MOTION TO ADDRESS COMMENTS	2.4
02/23/24	S INDELICATO	REVIEW AND FINALIZE SUPPLEMENTAL DIP MOTION AND ORDER	2.2
02/23/24	S INDELICATO	ATTEND DIP/9019 FILING UPDATE CALL WITH BUCHALTER AND OMM TEAMS	0.8
02/23/24	S INDELICATO	REVISE SUPPLEMENTAL DIP ORDER TO ADDRESS COMMENTS	1.0
02/23/24	D PEREZ	REVIEW COMMITTEE COMMENTS TO DIP MOTION AND FOLLOW UP WITH L. MILLER AND S. INDELICATO REGARDING SAME (.2); REVIEW DECLARATIONS ISO SAME AND REVISE PRELIMINARY STATEMENT REGARDING SAME (.6); REVIEW AND COMMENT ON REVISED DRAFT OF DIP MOTION AND ORDER (.5); EMAILS WITH BUCHALTER AND OMM TEAMS REGARDING DECLARATIONS ISO SAME (.2); ATTEND DIP/9019 FILING UPDATE CALL WITH BUCHALTER AND OMM TEAMS (.8)	2.3

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>
02/27/24	S INDELICATO	DRAFT AND REVISE ARGUMENT FOR SUPPLEMENTAL DIP MOTION	1.7
Total	B230 FINANCING/CASH COLLATERAL		85.4
B260 BOARD OF DIRECTORS MATTERS			
02/08/24	J GURULE	ICAP - PREP FOR BOARD MEETING	0.2
02/08/24	J GURULE	ICAP ATTEND BOARD CALL	1.0
02/20/24	J GURULE	EMAIL ROGERS REGARDING BOARD MINUTES	0.1
02/21/24	J GURULE	ATTEND BOARD MEETING	0.8
02/21/24	D PEREZ	ATTEND BOD MEETING REGARDING PONZI/DIP MOTION/9019 UPDATE (PARTIAL)	0.7
02/23/24	J GURULE	ATTENTION TO BOARD MATERIALS	0.3
Total	B260 BOARD OF DIRECTORS MATTERS		3.1
B320 PLAN & DISCLOSURE STATEMENT			
02/09/24	J GURULE	ICAP - ANALYSIS AND EMAILS WITH D. PEREZ REGARDING EXCLUSIVITY MOTION	0.3
02/09/24	D PEREZ	REVIEW AND COMMENT ON CRITICAL CASE CALENDAR (.2); EMAILS WITH OMM TEAM REGARDING EXCLUSIVITY MOTION (.3); REVIEW CASE LAW REGARDING SAME (.6)	1.1
02/12/24	S INDELICATO	REVIEW/ANALYZE TIMING FOR EXCLUSIVITY PERIODS	0.6
02/12/24	D PEREZ	DRAFT AND REVISE EXCLUSIVITY EXTENSION MOTION	2.3
02/12/24	S INDELICATO	RESEARCH REGARDING EXCLUSIVITY PERIODS	1.7
02/13/24	J GURULE	REVISIONS TO EXCLUSIVITY MOTION AND ORDER, RELATED CORRESPONDENCE	0.6
02/13/24	S INDELICATO	REVISE EXCLUSIVITY MOTION TO INCLUDE 9TH CIRCUIT CASE LAW	1.2
02/13/24	D PEREZ	REVISE EXCLUSIVITY EXTENSION MOTION (.7); DRAFT DECLARATION ISO SAME (1.4)	2.1
02/14/24	J GURULE	REVIEW AND FINAL SIGN OFF ON EXCLUSIVITY MOTION	0.3
02/14/24	D PEREZ	FINALIZE EXCLUSIVITY EXTENSION MOTION (1.0); CALL WITH K. TARAZI REGARDING SAME (.2)	1.2
Total	B320 PLAN & DISCLOSURE STATEMENT		11.4
B330 COURT HEARINGS			
02/22/24	J GURULE	ATTENDANCE AT TELEPHONIC STATUS CONFERENCE	0.5
Total	B330 COURT HEARINGS		0.5
Total Hours			293.7
Total Fees			373,088.00

Disbursements

Copying Expense Report Other (Incl. Out of Town Travel)	\$19.65 290.02
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Matter Name: DEBTOR MATTERS
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Online Research	30.70
Total Disbursements	\$340.37
Total Current Invoice	\$373,428.37

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<u>Date</u>	<u>Cost Type</u>	<u>Description</u>	<u>Qty</u>	<u>Amount</u>
02/28/24	E101	Lasertrak Printing - Jones, Patrick Pages: 52	52.00	\$7.80
02/28/24	E101	Lasertrak Printing - Jones, Patrick Pages: 35	35.00	5.25
02/28/24	E101	Lasertrak Printing - Jones, Patrick Pages: 44	44.00	6.60
Total for E101 - Lasertrak Printing				\$19.65
02/24/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Docket Report; 23-01243-WLH11 Fil or Ent: filed From: 1/1/1980 To: 2/26/2024 Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included	30.00	\$3.00
02/24/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Image468-0; 23-01243-WLH11 Document 468-0	30.00	3.00
02/24/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Image469-0; 23-01243-WLH11 Document 469-0	30.00	3.00
02/24/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Image467-0; 23-01243-WLH11	30.00	3.00
02/24/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Image470-0; 23-01243-WLH11	29.00	2.90
02/24/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Image471-0; 23-01243-WLH11 Document 471-0	5.00	0.50
02/24/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Image470-1; 23-01243-WLH11	5.00	0.50
02/24/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Image467-1; 23-01243-WLH11	5.00	0.50
02/24/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; 00PCL; Bankruptcy Party Search; All Courts; Name icap enterprises; Jurisdiction BK; All Courts; Page: 1	1.00	0.10
02/26/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Image17-0; 23-01243-WLH11	12.00	1.20
02/26/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Docket Report; 23-01243-WLH11 Fil or Ent: filed From: 1/1/1980 To: 2/26/2024 Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included	30.00	3.00
02/26/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; 00PCL; All Court Types Case Search; All Courts; Case Number 1243; Case Year 2023; Case Number 23-br-01243; Case Type br	1.00	0.10

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02/26/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; 00PCL; All Court Types Case Search; All Courts; Case Number 1243; Case Year 2023; Case Number 23-br-01243; Case Type br	1.00	0.10
02/26/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; 00PCL; All Court Types Case Search; All Courts; Case Title icap; Page: 1	1.00	0.10
02/26/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Image17-1; 23-01243-WLH11	3.00	0.30
02/26/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; NVBK; Image1-0; 08-23983-bam Document 1-0	30.00	3.00
02/26/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; NVBK; Docket Report; 08-23983-bam Fil or Ent: filed Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included	2.00	0.20
02/28/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; 00PCL; All Court Types Case Search; All Courts; Case Number 1243; Case Year 2023; Case Number 23-01243; Page: 1	1.00	0.10
02/28/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Docket Report; 23-01243-WLH11 Fil or Ent: filed From: 1/1/1980 To: 2/28/2024 Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included	30.00	3.00
02/29/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; 00PCL; Bankruptcy Case Search; All Courts; Case Number 1243; Case Year 2023; Case Number 23-1243; Jurisdiction BK; Page: 1	1.00	0.10
02/29/24	E106	Online Research (Miscellaneous); PACER - FEDERAL COURT DOCKET SERVICE; ; Patrick Jones; WAEBK; Docket Report; 23-01243-WLH11 Fil or Ent: filed From: 1/1/1980 To: 2/29/2024 Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included	30.00	3.00
Total for E106 - Online Research (Miscellaneous)				\$30.70
02/06/24	E110	JULIAN GURULE - Out-of-Town Telephone - JULIAN GURULE; INTERNATIONAL TELECOM. TRAVEL SEATTLE MEET WITH ICAP CREDITORS COMMITTEE - REPORT ID# 010064838408	1.00	\$8.00
02/06/24	E110	JULIAN GURULE - Out-of-Town Travel Hotel - JULIAN GURULE, 02/06/2024-02/07/2024 LODGING. TRAVEL SEATTLE MEET WITH ICAP CREDITORS COMMITTEE - REPORT ID# 010064838408	1.00	282.02
Total for E110 - Out-of-Town Telephone				\$290.02

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 Matter Name: DEBTOR MATTERS
 Matter: 0409314-00001

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Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>
Attorneys	
JULIAN GURULE	81.5
MADHU POCHA	29.3
JORGE DENEVE	4.1
PATRICK J. JONES	39.6
SAMANTHA M. INDELICATO	71.3
DIANA M. PEREZ	48.4
ALY BAILEY	17.7
Total for Attorneys	291.9
Paralegal/Litigation Support	
SHARLEAN PEREZ	1.8
Total for Paralegal/Litigation Support	1.8
Total	293.7

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